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BEFORE THE

Federal Communications Commission

WASHINGTON, D.C.

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SEP 22 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Petition for Rulemaking)
Sparta-Tomah Broadcasting Company, Inc.)
)
To Amend Section 73.202(b))
Table of Allotments)
FM Broadcast Stations)
(Coon Valley, Wisconsin))

MM Docket No. 97-169
RM-9121

To: Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau

COMMENTS OF BLUFF COUNTRY COMMUNITY RADIO

Bluff Country Community Radio ("Bluff Country"), by its attorneys and pursuant to Section 1.420 of the Commission's Rules, hereby comments on the above-referenced petition for rulemaking filed by Sparta-Tomah Broadcasting Company, Inc. ("Sparta-Tomah") to allot Channel 280 to Coon Valley, Wisconsin. As shown below, Bluff Country believes it would better serve the public interest to instead allot Channel 280A to both Westby, Wisconsin and to Lanesboro, Minnesota as a first full-time aural reception service for both communities.^{1/} Both of

^{1/} Bluff Country requests that these allotments be reserved for non-commercial educational use, for purposes of using the stations to advance educational programs relevant to the Westby and Lanesboro communities. A search of the Commission's database revealed that no reserved band channel was available for use as a maximum Class A facility in either community. However, if necessary to insure their allotment, Bluff Country will file for the channels even if not reserved for educational use, and will build the stations if it receives construction permits.

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these allotments are mutually exclusive with Sparta-Tomah's proposed Coon Valley allotment, and therefore neither community could receive a first time local aural service if the channel were allotted to Coon Valley.

DISCUSSION

Under the Commission's allotment criteria, priority for service should be set forth in the following order: (1) first full-time aural reception service; (2) second full-time aural reception service; (3) first local transmission service; and (4) other public interest factors. Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License, 4 FCC Rcd 4870, 4873 (1989), reconsideration granted in part, 5 FCC Rcd 7094 (1990).

While Sparta-Tomah has argued that Coon Valley is a community for allotment purposes, the allotment would only allow a first local service to a community with a population of only 817 people.^{2/} Allotting the channel to Lanesboro and Westby, however, will allow a first aural transmission service to be provided to communities with over 2,700 people.^{3/} Both Lanesboro and Westby easily qualify as communities for allotment purposes. Lanesboro and Westby are both incorporated cities. Each has a city hall, post office, fire and police departments, as well as numerous churches and businesses. The Commission has held that allotting a station to a community that has a population larger than the proposed community allotment, when both communities would be provided its first local service, better serves the public interest. Parker

^{2/} Based on the population for Coon Valley in the 1990 U.S. Census.

^{3/} In the 1990 U.S. Census a population of 858 people in Lanesboro and 1,866 people in Westby are reported.

and St. Joe Florida, MM Docket No. 9532, RM-8545 (released January 30, 1996).^{4/} This dual allotment would therefore be a more efficient allocation of broadcast spectrum by allowing Channel 280A to be used to serve a larger number of people.

As shown in the attached Engineering Statement prepared by Lyle Robert Evans, Channel 280A can be allotted to either Lanesboro or Westby at each community's nominal reference points in compliance with the Commission's city-grade coverage requirements, and each allotment separately complies with applicable minimum distance separation requirements.^{5/} To allot Channel 280A to both communities, however, requires a slight antenna/tower restriction for both Westby and Lanesboro. As shown in the Engineering Statement, however, there are many ideal tower sites in both communities that will allow for full contour coverage.

As stated, Lanesboro and Westby serve a much larger population than Coon Valley, and although both Lanesboro and Westby qualify as communities for allotment purposes, neither has a local aural broadcast service. The allotment of Channel 280A to both communities therefore furthers the Commission's allotment policy and Section 307(b) of the Communications Act, as amended. In accordance with Commission allotment policy, should Channel 280A be allotted to both Westby and to Lanesboro, Bluff Country would file an application to construct FM broadcast stations on the channels and will promptly construct such a station if its applications are granted.

^{4/} The Commission has held that noncommercial stations are considered transmission services for purposes of analyzing competing allotment proposals. However, as set forth in Footnote 1, if the Commission is unwilling to accept this analysis, Bluff County urges that the Commission allot these channels on a non-reserved basis, and Bluff Country will then apply for them for its educational purpose.

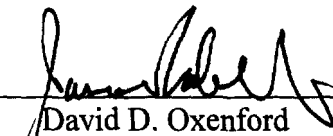
^{5/} As noted in the attached Engineering Exhibit, the allotment of Channel 280A to both Westby and Lanesboro will require a restriction of the antenna/tower locations at both communities.

CONCLUSION

For the reasons stated herein, Bluff Country Community Radio respectfully requests that the Commission allot Channel 280A to both Westby, Wisconsin and Lanesboro, Minnesota, and reserve that channel for noncommercial use. However, as set forth above, if necessary for this proposal to be adopted, Bluff Country would urge that the allotments be made on a non-reserved basis. In either instance, Bluff Country commits to filing for the channels and to properly construct the stations if it is awarded construction permits.

Respectfully submitted,

BLUFF COUNTRY COMMUNITY RADIO

By: 
David D. Oxenford
Jason S. Roberts

Its Attorneys

FISHER WAYLAND COOPER LEADER
& ZARAGOZA L.L.P.
2001 Pennsylvania Avenue, N.W.
Suite 400
Washington, D.C. 20006
(202) 659-3494

Dated: September 22, 1997

APPENDIX I

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

ENGINEERING STATEMENT

IN THE MATTER OF:

AMENDMENT OF SECTION 73.202(B),
TABLE OF ALLOTMENTS,
F.M. BROADCAST STATIONS,
(COON VALLEY, WESTBY, WISCONSIN
AND LANESBORO, MINNESOTA

]

] MM DOCKET NO. 97-169
] RM 9121
]
]
]

TO:

CHIEF, ALLOCATIONS BRANCH
POLICY AND RULES DIVISION
MASS MEDIA BUREAU

PREPARED FOR:

BLUFF COUNTRY COMMUNITY RADIO
SEPTEMBER 19, 1997

PREPARED BY:

LYLE ROBERT EVANS
BROADCAST CONSULTANT
1750 FREEDOM ROAD
LITTLE CHUTE, WISCONSIN 54140
(920) 687-0722

PROPONENT: Bluff Country Community Radio
Proposed Ch. 280A Allotments
Westby, WI, & Lanesboro, MN

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Prepared 09/19/97

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(Lanesboro, MN, Reference Coordinates)
5. ATTACHMENT C; DISTANCE SEPARATION STUDY
6. ATTACHMENT D; CHANNEL 280A DISTANCE SEPARATION STUDY
(Westby, WI, Restricted Coordinates)
7. ATTACHMENT E; CHANNEL 280A DISTANCE SEPARATION STUDY
(Lanesboro, WI, Restricted Coordinates)

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STATE OF WISCONSIN)
COUNTY OF OUTAGAMIE)
VILLAGE OF LITTLE CHUTE)

LYLE ROBERT EVANS, BEING FIRST DULY SWORN STATES:

THAT HE IS A ELECTRONIC COMMUNICATIONS TECHNICAL CONSULTANT
WITH OFFICES AT 1750 FREEDOM ROAD, LITTLE CHUTE, WISCONSIN,
54140;

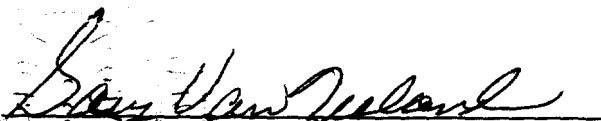
THAT HIS QUALIFICATIONS AS AN EXPERT IN ELECTRONIC
COMMUNICATIONS ENGINEERING ARE A MATTER OF RECORD WITH THE
FEDERAL COMMUNICATIONS COMMISSION IN WASHINGTON, D.C.;

THAT HE HAS PREPARED NUMEROUS AM, FM, MICROWAVE RADIO,
TELEVISION AND TRANSLATOR APPLICATIONS WHICH HAVE BEEN
PROCESSED TO GRANT BY THE FEDERAL COMMUNICATIONS COMMISSION;

THAT THE FOREGOING TECHNICAL REPORT WAS PREPARED BY HIM, AND
ALL CALCULATIONS AND/OR MEASUREMENTS AND EXHIBITS IN THE
ACCOMPANYING REPORT WERE MADE BY HIM PERSONALLY OR UNDER
HIS DIRECTION, AND THAT ALL FACTS CONTAINED HEREIN ARE TRUE OF
HIS PERSONAL KNOWLEDGE OR BELIEF, AND ON SUCH STATEMENTS
MADE ON BELIEF, THEY ARE BELIEVED TO BE TRUE AND CORRECT.


LYLE ROBERT EVANS, AFFIANT

SUBSCRIBED AND SWORN TO BEFORE ME THIS 19th DAY OF SEPTEMBER, 1997


NOTARY PUBLIC

DATE OF COMMISSION EXPIRATION:

7/19/98

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20054

IN THE MATTER OF:]
AMENDMENT OF SECTION 73.202(B),] MM DOCKET NO. 97-169
TABLE OF ASSIGNMENTS,] RM 9121
F.M. BROADCAST STATIONS.]
(COON VALLEY, WESTBY, WISCONSIN]
AND LANESBORO, MINNESOTA]
TO: THE COMMISSION]

ENGINEERING STATEMENT

This Engineering Statement concerns the above captioned Counterproposal to Petition For Rulemaking Number: 9121, in Mass Media Docket Number: 97-169.

Bluff Country Community Radio ("BCCR"), proponent, retained the services of Lyle Robert Evans, Technical Consultant, to conduct engineering studies and prepare necessary Statements and Attachments to support the Bluff Country referenced Counterproposal.

The Commission's NOTICE OF PROPOSED RULE MAKING in Mass Media Docket Number: 97-169, adopted: July 23, 1997, Released: August 01, 1997, stated: In view of the fact that the proposed allotment would provide a first local FM service to Coon Valley, Wisconsin, the Commission believes it would be in the public interest to solicit comments to

amend the FM Table of Allotments, Section 73.202(b) of the Commission's rules for the community listed below, to read as follows.

| <u>COMMUNITY:</u> | <u>EXISTING:</u> | <u>PROPOSED:</u> |
|-------------------|------------------|------------------|
| Coon Valley, WI | NONE | ' 280A |

Interested parties may file comments on or before September 22, 1997, and reply comments on or before October 07, 1997.

In response to said "NOTICE" solicitation Bluff Country Community Radio advanced the following Counterproposal in Mass Media Docket Number: 97-169.

| <u>COMMUNITY:</u> | <u>EXISTING:</u> | <u>PROPOSED:</u> |
|-------------------|------------------|------------------|
| Westby, WI | NONE | 280A |
| Lanesboro, MN | NONE | 280A |

This Counterproposal is mutually exclusive with allotment of FM Channel 280A (103.9 MHz.) at Coon Valley, Wisconsin.

The Reference Geographic Coordinates of Westby, specified in the National Atlas of the United States of America, published by the United States Department of the Interior Geological Survey are: 43°-39'-01" North Latitude, 90°-51'-18" West Longitude.

Attachment "A" to this Engineering Statement, an

FM Channel 280A Distance Separation Study, with Westby Reference Coordinates as base, sets forth all FM Broadcast Station assignments, applications and allotments relating to an allotment of FM Channel 280A at Westby, with distance in kilometers and bearing in degrees True.

Attachment A displays an FM Channel 280A Allotment at Westby in complete compliance with all applicable minimum distance separation requirements set forth in 47 Code of Federal Regulations §73.207.

The Reference Geographic Coordinates of Lanesboro, specified in the National Atlas of the United States of America are: 43°-42'-48" North Latitude, 91°-58'-24" West Longitude.

Attachment "B" to this Engineering Statement, an FM Channel 280A Distance Separation Study, with Lanesboro Reference Coordinates as base, sets forth all FM Broadcast Station assignments, applications and allotments relating to an allotment of FM Channel 280A at Lanesboro, with distance in kilometers and bearing in degrees True.

Attachment B displays an FM Channel 280A Allotment at Lanesboro in complete compliance with all applicable minimum distance separation requirements set forth in 47 Code of Federal Regulations §73.207.

Bluff Country Community Radio proposes amendment of 47 Code of Federal Regulations §73.202(b), Table of FM

Allotments, to allot FM Channel 280A (103.9 MHz.) to Westby, Wisconsin, an incorporated city, as that community's first aural service, and to allot FM Channel 280A (103.9 MHz.) to the community of Lanesboro, Minnesota, an incorporated city, as that community's first aural service.

Attachment "C" to this Engineering Statement displays distance in kilometers and bearing in degrees true from the Reference Coordinates of Westby to the Reference Coordinates of Lanesboro as: 90.39 kilometers (56.18 miles) at a bearing of 274.4 degrees True.

This distance is less than the minimum distance separation between stations set forth in 47 Code of Federal Regulations §73.207, Table A.

To allot FM Channel 280A to both Westby and Lanesboro, and comply with minimum distance separation requirements for FM Broadcast channel allotments, it is necessary to restrict antenna/tower locations at Westby and Lanesboro.

At Westby it is necessary to restrict an operation on FM Channel 280A, 13.00 kilometers (8.10 miles), at a bearing of 102.4 degrees True, from the Westby Reference Coordinates to geographic coordinates:

43°-37'-30" North Latitude, 90°-41'-40" West Longitude.

At Lanesboro it is necessary to restrict an operation on FM Channel 280A, 11.75 kilometers (7.30 miles),

at a bearing of 280.9 degrees True, from the Lanesboro Reference Coordinates to geographic coordinates:
43°-44'-00" North Latitude, 92°-07'-00" West Longitude.

Distance between the FM Channel 280A proposed restricted allotment at Westby and the FM Channel 280A proposed restricted allotment at Lanesboro is 115.02 kilometers (71.48 miles), greater than required minimum distance separation between stations set forth in 47 Code of Federal Regulations §73.207, Table A.

Attachment "D" to this Engineering Statement, an FM Channel 280A Distance Separation Study, with Westby proposed Restricted Allotment Coordinates as base, sets forth all FM Broadcast Station assignments, applications and allotments relating to an allotment of FM Channel 280A at Westby, with distance in kilometers and bearing in degrees True.

Attachment D displays an FM Channel 280A Restricted Allotment at Westby in complete compliance with all applicable minimum distance separation requirements set forth in 47 Code of Federal Regulations §73.207.

Attachment "E" to this Engineering Statement, an FM Channel 280A Distance Separation Study, with Lanesboro proposed Restricted Allotment Coordinates as base, sets forth all FM Broadcast Station assignments, applications and allotments relating to an allotment of FM Channel 280A at

Lanesboro with distance in kilometers and bearing in degrees True.

Attachment E displays an FM Channel 280A Restricted Allotment at Lanesboro in complete compliance with all applicable minimum distance separation requirements set forth in 47 Code of Federal Regulations §73.207.

Many ideal antenna/tower locations (transmitter sites) exist at both Westby and Lanesboro from which the requisite 70.0 dBu (3.16 mV/m) coverage contour can be provided to the entire "Principal Community".

Bluff Country Community Radio proposes the allotments of FM Channel 280A to Westby, Wisconsin, and Lanesboro, Minnesota, be reserved for Noncommercial Educational use.

A "Search" of FM Channel 200 (88.1 MHz.) thru 220 (91.9 MHz.), conducted with Westby Reference Coordinates as base, determined no reserved band Channel available for use as a maximum Class A facility at Westby.

A "Search" of FM Channel 200 (88.1 MHz.) thru 220 (91.9 MHz.), conducted with Lanesboro Reference Coordinates as base, determined no reserved band Channel available for use as a maximum Class A facility at Lanesboro.

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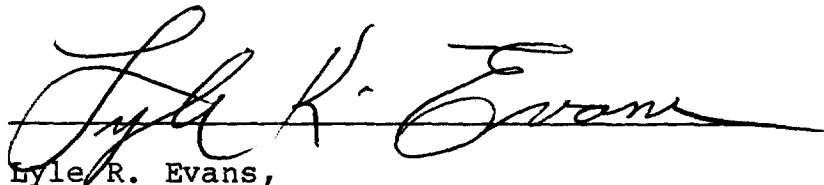
CONCLUSION

Allotment of FM Channel 280A to Westby, Wisconsin, and Lanesboro, Minnesota, can be accomplished with no FM Channel substitutions. No multiple community "tinkering with the table" is required to allot FM Channel 280A at both Westby and Lanesboro.

The Bluff Country Community Radio proposed amendment of 47 Code of Federal Regulations §73.202(b), Table of FM Allotments, shall provide residents Westby and vicinity and Lanesboro and vicinity a first local aural broadcast transmission service.

The most recent applicable FCC Rules and Regulations have been used in the preparation of this Engineering Statement. It is believed to conform to the Commission's Technical Standards.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Lyle R. Evans", is written over a horizontal line.

Lyle R. Evans,
Technical Consultant to:
Bluff County Community Radio

September 19, 1997

Lyle Robert Evans
Technical Consultant
1750 Freedom Road
Little Chute, Wisconsin 54140
(920) 687-0722

ENGINEERING STATEMENT; CONCLUDED

FM CHANNEL 280A DISTANCE SEPERATION STUDY

LOCATION: WESTBY, WISCONSIN
 SERVICE: COMMERCIAL FM
 CHANNEL: 280
 FREQUENCY: 103.9 MHz.
 ZONE: II
 CLASS: A
 COORDINATES: 43°-39'-01" N.L., 90°-51'-18" W.L. (CITY REFERENCE COORDINATES)
 PETITIONER: BLUFF COUNTRY COMMUNITY RADIO
 DATE: SEPTEMBER 19, 1997

| CALL STATUS | CITY STATE | FCC FILE | CHAN. FREQ. | ERP (KW) HAAT (M) | LATITUDE LONGITUDE | BEAR. (DEG.) | DIST. (KM.) | REQ. (KM.) |
|------------------|------------------------|---------------|----------------|----------------------|-----------------------|-----------------|------------------|-----------------|
| WIZM (FM) LIC | LA CROSSE WI | BLH-830527AE | 227C 93.3 | 100.00 311.00 | 43-48-23 91-22-04 | 293.0 | 44.81 15.81 | 29.0 CLEAR |
| WGLX (FM) LIC | WISCONSIN RAPIDS WI | BLH-960308KB | 277C1 103.3 | 100.00 101.00 | 44-24-56 89-50-07 | 43.4 | 117.95 42.95 | 75.0 CLEAR |
| KNEI (FM) CP | WAUKON WI | BMPH-941229IB | 278C2 103.5 | 9.30 175.00 | 43-18-28 91-27-18 | 232.0 | 61.68 6.68 | 55.0 CLEAR |
| WWIB LIC | HALLIE WI | BMLH-950914KC | 279C1 103.7 | 100.00 207.00 | 45-06-35 91-09-43 | 351.6 | 164.01 31.01 | 133.0 CLEAR |
| PRM | COON VALLEY WI | MM DOC 97-169 | 280A 103.9 | 0.00 0.00 | 43-42-12 91-00-48 | 294.8 | 14.05 -100.95 | 115.0 SHORT* |
| KNEI (FM) LIC | WAUKON WI | BLH-4240 | 280A 103.9 | 3.00 91.00 | 43-17-32 81-27-35 | 231.0 | 63.06 -51.94 | 115.0 SHORT# |
| WZEE LIC | MADISON WI | BLH-850227KS | 281B 104.1 | 9.40 341.00 | 43-03-09 89-28-42 | 120.4 | 129.88 16.88 | 113.0 CLEAR |
| KNFX (FM) LIC | SPRING VALLEY WI | BLH-931201KC | 282A 104.3 | 2.80 144.00 | 43-33-46 92-25-29 | 265.6 | 127.02 96.02 | 31.0 CLEAR |
| WAXX LIC | EAU CLAIRE WI | BLH-7142 | 283C 104.5 | 100.00 549.00 | 44-39-51 90-57-41 | 355.7 | 112.98 17.98 | 95.0 CLEAR |

-----END FM CHANNEL 280A DISTANCE SEPERATION STUDY-----

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FM CHANNEL 280A DISTANCE SEPERATION STUDY

LOCATION: WESTBY, WISCONSIN
SERVICE: COMMERCIAL FM
CHANNEL: 280
FREQUENCY: 103.9 MHz.
ZONE: II
CLASS: A
COORDINATES: 43°-39'-01" N.L., 90°-51'-18" W.L. (CITY REFERENCE COORDINATES)
PETITIONER: BLUFF COUNTRY COMMUNITY RADIO
DATE: SEPTEMBER 19, 1997

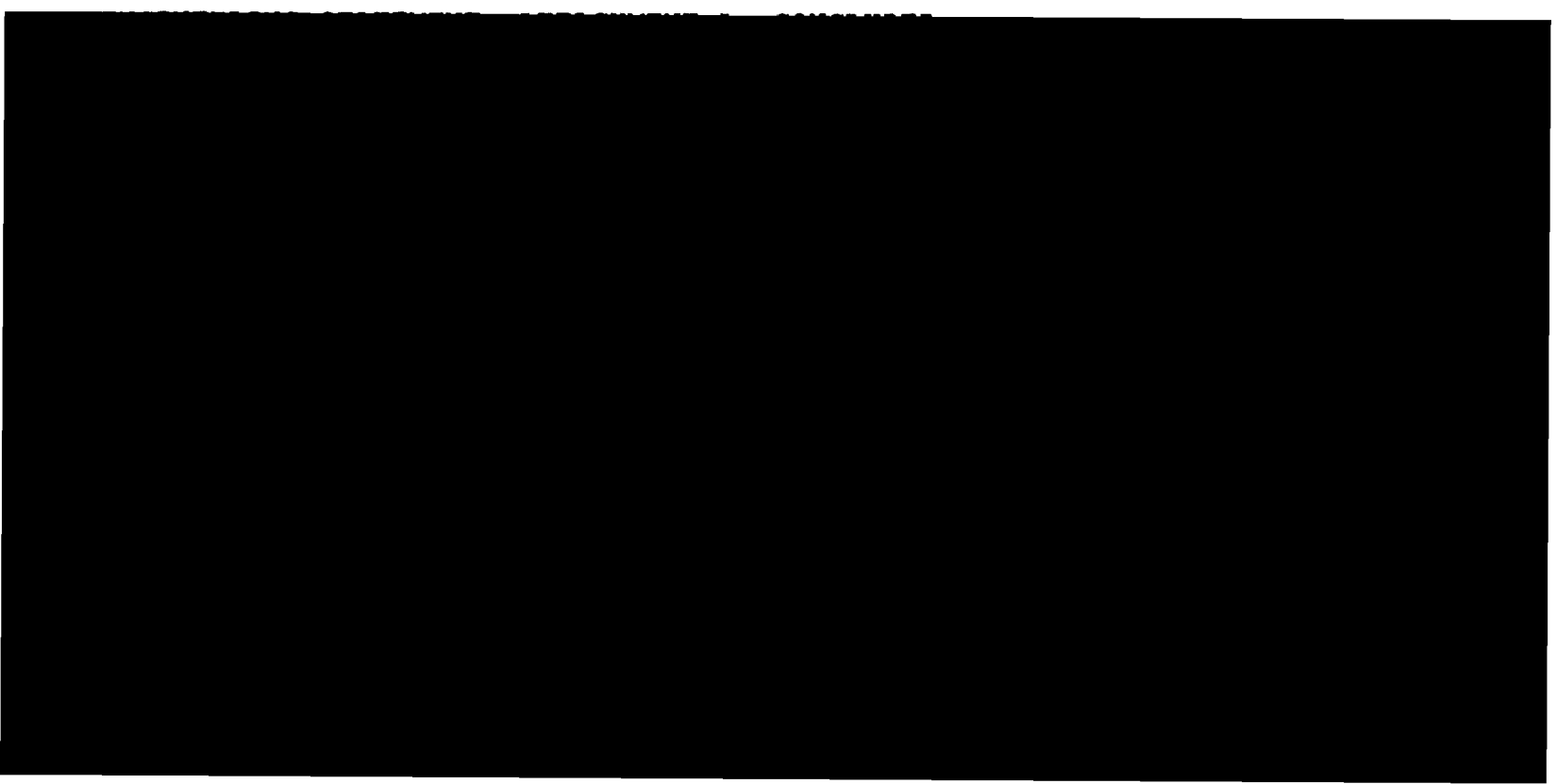
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NOTES: (*) The allotment whose indicated distance separation status is followed by a asterisk(*) is the Coon Valley, Wisconsin, Channel 280A allotment proposed by Mass Media Docket Number 97-169.

This attachment is part of an engineering statement that supports a conterproposal in Mass Media Docket Number 97-169.

(#) The assignment whose indicated distance seperation is followed by a pound sign (#) is the Licensed Station KNEI(FM) which has moved to Channel 278C2 per Mass Media Docket Number 89-257. It is not a concern of this Counterproposal.

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FM CHANNEL 280A DISTANCE SEPERATION STUDY

LOCATION: LANESBORO, MINNESOTA
 SERVICE: COMMERCIAL FM
 CHANNEL: 280
 FREQUENCY: 103.9 MHz.
 ZONE: II
 CLASS: A
 COORDINATES: 43°-42'-48" N.L., 91°-58'-24" W.L. (CITY REFERENCE COORDINATES)
 PETITIONER: BLUFF COUNTRY COMMUNITY RADIO
 DATE: SEPTEMBER 19, 1997

| CALL STATUS | CITY STATE | FCC FILE | CHAN. FREQ. | ERP (KW) HAAT (M) | LATITUDE LONGITUDE | BEAR. (DEG.) | DIST. (KM.) | REQ. (KM.) |
|-----------------|------------------------|---------------|----------------|----------------------|-----------------------|-----------------|------------------|-----------------|
| WIZM(FM) LIC | LA CROSSE WI | BLH-830527AE | 227C 93.3 | 100.00 311.00 | 43-48-23 91-22-04 | 77.8 | 49.85 20.85 | 29.0 CLEAR |
| WGLX(FM) LIC | WISCONSIN RAPIDS WI | BLH-960308KB | 277C1 103.3 | 100.00 101.00 | 44-24-56 89-50-07 | 64.7 | 188.24 113.24 | 75.0 CLEAR |
| KNEI(FM) CP | WAUKON WI | BMPH-941229IB | 278C2 103.5 | 9.30 175.00 | 43-18-28 91-27-18 | 137.0 | 61.54 6.54 | 55.0 CLEAR |
| KCZY LIC | OSAGE WI | BLH-930616KD | 279A 103.7 | 6.00 47.00 | 43-19-20 92-51-22 | 238.9 | 83.56 11.56 | 72.0 CLEAR |
| PRM | COON VALLEY WI | MM DOC 97-169 | 280A 103.9 | 0.00 0.00 | 43-42-12 91-00-48 | 90.8 | 77.33 -37.67 | 115.0 SHORT* |
| KNEI(FM) LIC | WAUKON WI | BLH-4240 | 280A 103.9 | 3.00 91.00 | 43-17-32 81-27-35 | 183.3 | 62.57 -52.43 | 115.0 SHORT# |
| KMJZ LIC | ST. LOUIS PARK MN | BLH-960411KC | 281C1 104.1 | 89.00 315.00 | 45-03-30 93-07-27 | 329.0 | 175.35 42.35 | 133.0 CLEAR |
| KNFX(FM) LIC | SPRING VALLEY WI | BLH-931201KC | 282A 104.3 | 2.80 144.00 | 43-33-46 92-25-29 | 254.4 | 40.08 9.08 | 31.0 CLEAR |
| WAXX LIC | EAU CLAIRE WI | BLH-7142 | 283C 104.5 | 100.00 549.00 | 44-39-51 90-57-41 | 37.0 | 133.07 38.07 | 95.0 CLEAR |

-----END FM CHANNEL 280A DISTANCE SEPERATION STUDY-----

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FM CHANNEL 280A DISTANCE SEPERATION STUDY

LOCATION: LANESBORO, MINNESOTA
SERVICE: COMMERCIAL FM
CHANNEL: 280
FREQUENCY: 103.9 MHz.
ZONE: II
CLASS: A
COORDINATES: 43°-42'-48" N.L., 91°-58'-24" W.L. (CITY REFERENCE COORDINATES)
PETITIONER: BLUFF COUNTRY COMMUNITY RADIO
DATE: SEPTEMBER 19, 1997

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NOTES: (*) The allotment whose indicated distance separation status is followed by a asterisk(*) is the Coon Valley, Wisconsin, Channel 280A allotment proposed by Mass Media Docket Number 97-169.

This attachment is part of an engineering statement that supports a conterproposal in Mass Media Docket Number 97-169.

(#) The assignment whose indicated distance seperation is followed by a pound sign (#) is the Licensed Station KNEI(FM) which has moved to Channel 278C2 per Mass Media Docket Number 89-257. It is not a concern of this Counterproposal.

ENGINEERING STATEMENT, ATTACHMENT B; CONCLUDED.

ATTACHMENT C

Page 1 of 1

FM CHANNE 280A DISTANCE SEPARATION STUDY

LOCATION: WESTBY, WISCONSIN
SERVICE: FM
CHANNEL: 280
CLASS: A
FREQUENCY: 103.9 MHZ.
ZONE: II
COORDINATES: 43°-42'-48" N.L., 91°-58'-24" W.L. (CITY REFERENCE COORDINATES)
PETITIONER: BLUFF COUNTRY COMMUNITY RADIO
DATE: SEPTEMBER 19, 1997

| CALL STATUS | CITY STATE | FCC FILE | CHAN. REFERENCE FREQ. COORDINATES | LATITUDE LONGITUDE | BEAR. (DEG.) | DIST. (KM.) | REQ. (KM.) |
|----------------|---------------|----------|--------------------------------------|-----------------------|-----------------|----------------|---------------|
| PRM | LANESBORO | | 280A | 43-42-48 | 274.4 | 90.39 | 115.0 |
| LIC | MN | | 103.9 | 91-58-24 | | -24.61 | SHORT |

ATTACHMENT C; CONCLUDED

FM CHANNEL 280A DISTANCE SEPERATION STUDY

LOCATION: WESTBY, WISCONSIN
 SERVICE: COMMERCIAL FM
 CHANNEL: 280
 FREQUENCY: 103.9 MHz.
 ZONE: II
 CLASS: A
 COORDINATES: 43°-37'-30" N.L., 90°-41'-50" W.L. (RESTRICTED ALLOTMENT COORD.)
 PETITIONER: BLUFF COUNTRY COMMUNITY RADIO
 DATE: SEPTEMBER 19, 1997

| CALL STATUS | CITY STATE | FCC FILE | CHAN. FREQ. | ERP(KW) HAAT(M) | LATITUDE LONGITUDE | BEAR. (DEG.) | DIST. (KM.) | REQ. (KM.) |
|-----------------|------------------------|---------------|----------------|--------------------|-----------------------|-----------------|------------------|-----------------|
| WIZM(FM) LIC | LA CROSSE WI | BLH-830527AE | 227C 93.3 | 100.00 311.00 | 43-48-23 91-22-04 | 290.8 | 57.86 28.68 | 29.0 CLEAR |
| WGLX(FM) LIC | WISCONSIN RAPIDS WI | BLH-960308KB | 277C1 103.3 | 100.00 101.00 | 44-24-56 89-50-07 | 37.8 | 111.77 36.77 | 75.0 CLEAR |
| KNEI(FM) CP | WAUKON WI | BMPH-941229IB | 278C2 103.5 | 9.30 175.00 | 43-18-28 91-27-18 | 240.3 | 70.73 15.73 | 55.0 CLEAR |
| WWIB LIC | HALLIE WI | BMLH-950914KC | 279C1 103.7 | 100.00 207.00 | 45-06-35 91-09-43 | 347.5 | 169.09 36.09 | 133.0 CLEAR |
| PRM | COON VALLEY WI | MM DOC 97-169 | 280A 103.9 | 0.00 0.00 | 43-42-12 91-00-48 | 288.9 | 26.92 -88.08 | 115.0 SHORT* |
| KNEI(FM) LIC | WAUKON WI | BLH-4240 | 280A 103.9 | 3.00 91.00 | 43-17-32 81-27-35 | 239.2 | 71.94 -43.06 | 115.0 SHORT# |
| WZEE LIC | MADISON WI | BLH-850227KS | 281B 104.1 | 9.40 341.00 | 43-03-09 89-28-42 | 122.4 | 117.54 4.54 | 113.0 CLEAR |
| KNFX(FM) LIC | SPRING VALLEY WI | BLH-931201KC | 282A 104.3 | 2.80 144.00 | 43-33-46 92-25-29 | 267.2 | 139.58 108.58 | 31.0 CLEAR |
| WAXX LIC | EAU CLAIRE WI | BLH-7142 | 283C 104.5 | 100.00 549.00 | 44-39-51 90-57-41 | 349.8 | 117.38 22.38 | 95.0 CLEAR |

-----END FM CHANNEL 280A DISTANCE SEPERATION STUDY-----

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FM CHANNEL 280A DISTANCE SEPERATION STUDY

LOCATION: WESTBY, WISCONSIN
SERVICE: COMMERCIAL FM
CHANNEL: 280
FREQUENCY: 103.9 MHz.
ZONE: II
CLASS: A
COORDINATES: 43°-37'-30" N.L., 90°-41'-50" W.L. (RESTRICTED ALLOTMENT COORD.)
PETITIONER: BLUFF COUNTRY COMMUNITY RADIO
DATE: SEPTEMBER 19, 1997

=====

NOTES: (*) The allotment whose indicated distance separation status is followed by a asterisk(*) is the Coon Valley, Wisconsin, Channel 280A allotment proposed by Mass Media Docket Number 97-169.

This attachment is part of an engineering statement that supports a conterproposal in Mass Media Docket Number 97-169.

(#) The assignment whose indicated distance separation is followed by a pound sign (#) is the Licensed Station KNEI(FM) which has moved to Channel 278C2 per Mass Media Docket Number 89-257. It is not a concern of this Counterproposal.

ENGINEERING STATEMENT, ATTACHMENT D; CONCLUDED.

ATTACHMENT E

PAGE 1 OF 2

FM CHANNEL 280A DISTANCE SEPERATION STUDY

LOCATION: LANESBORO, MINNESOTA
 SERVICE: COMMERCIAL FM
 CHANNEL: 280
 FREQUENCY: 103.9 MHz.
 ZONE: II
 CLASS: A
 COORDINATES: 43°-44'-00" N.L., 92°-07'-00" W.L. (RESTRICTED ALLOTMENT COORD.)
 PETITIONER: BLUFF COUNTRY COMMUNITY RADIO
 DATE: SEPTEMBER 19, 1997

| CALL STATUS | CITY STATE | FCC FILE | CHAN. FREQ. | ERP (KW) HAAT (M) | LATITUDE LONGITUDE | BEAR. (DEG.) | DIST. (KM.) | REQ. (KM.) |
|------------------|------------------------|---------------|----------------|----------------------|-----------------------|-----------------|------------------|-----------------|
| WIZM (FM) LIC | LA CROSSE WI | BLH-830527AE | 227C 93.3 | 100.00 311.00 | 43-48-23 91-22-04 | 82.0 | 60.84 31.84 | 29.0 CLEAR |
| WGLX (FM) LIC | WISCONSIN RAPIDS WI | BLH-960308KB | 277C1 103.3 | 100.00 101.00 | 44-24-56 89-50-07 | 67.5 | 197.73 122.73 | 75.0 CLEAR |
| KNEI (FM) CP | WAUKON WI | BMPH-941229IB | 278C2 103.5 | 9.30 175.00 | 43-18-28 91-27-18 | 131.3 | 71.40 16.40 | 55.0 CLEAR |
| KCZY LIC | OSAGE WI | BLH-930616KD | 279A 103.7 | 6.00 47.00 | 43-19-20 92-51-22 | 232.8 | 75.23 3.23 | 72.0 CLEAR |
| PRM | COON VALLEY WI | MM DOC 97-169 | 280A 103.9 | 0.00 0.00 | 43-42-12 91-00-48 | 92.1 | 88.91 -26.09 | 115.0 CLEAR* |
| KNEI (FM) LIC | WAUKON WI | BLH-4240 | 280A 103.9 | 3.00 91.00 | 43-17-32 81-27-35 | 132.6 | 72.28 -42.72 | 115.0 SHORT# |
| KMJZ LIC | ST. LOUIS PARK MN | BLH-960411KC | 281C1 104.1 | 89.00 315.00 | 45-03-30 93-07-27 | 331.8 | 167.69 34.69 | 133.0 CLEAR |
| KNFX (FM) LIC | SPRING VALLEY WI | BLH-931201KC | 282A 104.3 | 2.80 144.00 | 43-33-46 92-25-29 | 232.7 | 31.25 0.25 | 31.0 CLEAR |
| WAXX LIC | EAU CLAIRE WI | BLH-7142 | 283C 104.5 | 100.00 549.00 | 44-39-51 90-57-41 | 41.3 | 138.66 43.66 | 95.0 CLEAR |

-----END FM CHANNEL 280A DISTANCE SEPERATION STUDY-----

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FM CHANNEL 280A DISTANCE SEPERATION STUDY

LOCATION: LANESBORO, MINNESOTA
SERVICE: COMMERCIAL FM
CHANNEL: 280
FREQUENCY: 103.9 MHz.
ZONE: II
CLASS: A
COORDINATES: 43°-44'-00" N.L., 92°-07'-00" W.L. (RESTRICTED ALLOTMENT COORD.)
PETITIONER: BLUFF COUNTRY COMMUNITY RADIO
DATE: SEPTEMBER 19, 1997

=====

NOTES: (*) The allotment whose indicated distance separation status is followed by a asterisk(*) is the Coon Valley, Wisconsin, Channel 280A allotment proposed by Mass Media Docket Number 97-169.

This attachment is part of an engineering statement that supports a conterproposal in Mass Media Docket Number 97-169.

(#) The assignment whose indicated distance separation is followed by a pound sign (#) is the Licensed Station KNEI(FM) which has moved to Channel 278C2 per Mass Media Docket Number 89-257. It is not a concern of this Counterproposal.

ENGINEERING STATEMENT, ATTACHMENT E; CONCLUDED.

CERTIFICATE OF SERVICE

I, Rodenatha Harper, do hereby certify that I have this 22nd day of September, 1997,
mailed by first-class United States mail, postage prepaid, copies of the foregoing

"COMMENTS OF BLUFF COUNTRY COMMUNITY RADIO" to the following:

John A. Karousos, Chief*
Allocations Branch
Policy and Rules Division
Mass Media Bureau
Federal Communications Commission
2000 M Street, NW, Room 565
Washington, DC 20554

Ms. Kathleen Scheuerle*
Allocations Branch
Policy and Rules Division
Mass Media Bureau
Federal Communications Commission
2000 M Street, NW, Room 565
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John S. Neely
Miller & Miller, P.C.
1990 M Street, NW
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Washington, D.C. 20036


Rodenatha Harper

***HAND DELIVERY**

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